1500 114th Ave SE
Suite 100
Bellevue, WA. 98004

May 29, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

RE: E-911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

Sotto Wireless, Inc. ("Sotto") is a new, start up provider of telecommunications solutions to small and medium sized businesses. Sotto's service platform combines best-of-breed cellular voice and data services, office phone features, and wireless applications into one flexible, easy-to-use service. Sotto's solution streamlines a business's communications by combining the mobility of cellular service and wireless applications with the functionality of office phone systems into one service. Sotto's dual-mode Hybrid Wireless Phone solution incorporates both cellular and WiFi capability into one phone. This phone sends calls over the Internet (VoIP) using the customer's wireless LAN in the office and uses the cellular network when the customer is away from the office. Usage of the wireless LAN improves in-building wireless coverage and reduces costs. The phone supports both wireless voice and data communications.

While Sotto is therefore not simply an interconnected VoIP provider, it is filing this letter to inform the Commission of its innovative E911 solution. *See* First Report and Order in the above-captioned proceeding, FCC 05-116, 20 FCC Rcd 10245 (released June 3, 2005); Letter from Enforcement Bureau Regarding Interconnected Voice Over Internet Protocol 911Compliance, WC Docket Nos. 04-36, 05-196, DA 05-2945 (released Nov. 7, 2005).

Sotto's E911 service solution utilizes network capabilities from its own network and third party providers, including services provided by Intrado Inc. ("Intrado"), to provide E911 service for all calls originated on the Sotto platform. The Sotto platform is architected to leverage the design of its Hybrid Wireless phones, wherein if a customer dials 911 on such a phone, the phone will first attempt to route the call over the strongest available GSM wireless network, regardless of location of the phone or the provider of the GSM wireless network.[1] If the 911 call attempt on the strongest GSM network should fail, then the phone will try the call on the next strongest GSM network, until all GSM networks available have been attempted. The call would then be processed over the wireless carrier's E911 network

[1] The phone would route the 911 call over the strongest GSM network available even if the phone were operating within a customer's office and utilizing the customer's LAN and broadband connection for other communications.

and provide the appropriate PSAP with Phase 0, Phase I or Phase II call back and location information as requested by that PSAP and implemented by that wireless carrier. This solution provides the same reliability for 911 calls as commercially available CMRS services given the ubiquity of GSM coverage in all of Sotto's markets and the Hybrid Wireless Phone's ability to seek any GSM carrier offering service in the market.

In the rare circumstance when the customer is using the Hybrid Wireless Phone in a location where there is LAN coverage, but no GSM network available, the Sotto platform will direct the 911 call to the Intrado system. This provides an additional availability of E911 service above that provided by normal CMRS services. Sotto has contracted with Intrado to provide a state of the art E911 system for this small number of VoIP-based 911 calls. This system utilizes a location database that allows Intrado to route these calls to the appropriate PSAP with the specificity of call-back and location information requested by that PSAP. This is achieved by Sotto requiring each of its customers to register each of its LAN locations where its Hybrid Wireless Phones will be used in advance of using the phone on the LAN. This geographic address ("MSAG address") is then correlated with an Internet address associated with the LAN location and sent to the Intrado database. The Sotto system will not accept LAN-based calls from any address that has not been pre-registered to the customer. The Sotto system allows the customer to add LAN addresses as its locations change through a registration process and the Intrado database is dynamically updated to include the new information. Each time the Hybrid Wireless Phone places an E911 call, the Internet address is sent to Intrado along with the call setup information. Therefore, in the unusual circumstance that a 911 call is placed from the phone and no GSM coverage is available from any wireless provider, the Intrado system will use the Internet address to select the appropriate MSAG address and the geographic information associated with it in its database to route the call to the appropriate PSAP with the appropriate call back and location information. Sotto Wireless also provides fixed IP desk phones which utilize the same process for 911 calls on the LAN.

Sotto believes that it is offering its customers one of the most advanced, productive and cost-effective communications systems available today. Sotto also believes that its advanced network and vendor partners have created one of the most effective E911 solutions available for its unique hybrid platform. Sotto is confident that this system is fully compliant with the Commission's rules and policies.

Respectfully submitted,
/ s/ Roderick Nelson
Chief Executive Officer

cc: Kathy Berthot - kathy.berthot@fcc.gov
Carol Simpson – carol.simpson@fcc.gov
Best Copy and Printing - fcc@bcpiweb.com